Recent developments in workplace AI adoption

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Artificial intelligence (AI) is no longer merely a futuristic concept but a present-day reality—a practical business tool that is routinely used in management and production. Organizations are increasingly adopting generative AI and analytics solutions for tasks such as writing, sorting, decision-making, monitoring and evaluating. However, this is often done without any prior structured planning.

Employers now face the dual challenge of achieving productivity gains quickly while ensuring that AI does not pose legal, reputational or operational risks. The range of applications is expanding to include writing assistance, decision-making support, performance analysis, digital monitoring and incident and accident prediction. This raises questions of interest to both executives and the media. For example, who should be held responsible when the tool makes a mistake? What data is being used? How far can employers go in monitoring their employees?

If properly regulated, AI can support innovation and expedite its implementation, while also contributing to workplace well-being, health and safety. In Quebec, these benefits are particularly significant in the context of an aging population, labour shortages and increased pressure to boost productivity. Addressing this situation requires solutions that foster growth and competitiveness.

The use of AI systems in the workplace raises real and multifaceted challenges. These include protecting personal information and maintaining confidentiality, establishing liability and accountability where errors or failures occur, and considering the potential impact on workloads and the work environment.

Aware of the effect that digital transformation and AI are having on the workplace, the Minister of Labour launched a consultative process to assess whether existing legislation adequately addressed these developments. In October 2025, he tasked the Comité consultatif du travail et de la main-d'œuvre (the "CCTM") with further exploring ideas and developing a shared vision regarding:

Consultation processes that factor in the implications of AI use in the workplace;

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Ethical, governance and transparency principles in human resources decision-making;
The prevention of emerging occupational health and safety risks.[1]

CCTM report: Recommendations

The Avis du CCTM concernant les enjeux entourant l'implantation et l'usage des systèmes d'intelligence artificielle en milieux de travail au Québec [CCTM report on the implications of implementing and using artificial intelligence systems in Quebec workplaces] ("CCTM Report") was released on April 29, 2026. The recommendations set out in the report regarding the implementation and use of AI systems in Quebec workplaces include, in particular:

Applying the current legal framework governing labour and employment law in Quebec;
Preserving the essential role of human judgment—and the responsibility that comes with it—in automated decision-making processes;
Applying laws respecting the protection of personal information[2] when developing, implementing and using AI systems, and prioritizing solutions that limit the use of electronic surveillance;
Implementing an algorithmic impact assessment process that would involve employees and take into account the impact of automated decision-making on fundamental rights and privacy;
Ensuring that organizations continue to support employee mobility and ongoing professional development;
Regulating algorithms through sound governance practices that promote transparency and explainability in algorithmic decision-making;
Placing emphasis on the need to pay special attention to discriminatory biases.

In its report, the CCTM also makes recommendations to the Commission d'accès à l'information, such as updating its guide on drafting privacy policies to include disclosure requirements regarding AI and surveillance technologies, and encouraging employers to inform employees of their intention to use partially or fully automated decision-making processes.

Lastly, the CCTM recommends that the Ministère du Travail develop, in collaboration with the CCTM, a guide to support the implementation of responsible, compliant and socially acceptable AI.

Guide released by the Ministère du Travail: 5 principles

Further to the recommendations made in the CCTM report, the Minister of Labour released, on June 12, 2026, a document titled L'intelligence artificielle au travail : Guide d'accompagnement pour une intégration responsable [A guide to using artificial intelligence responsibly in the workplace] (the "Guide").

The Guide aims to ensure that AI is integrated into workplaces in a responsible, user-centric and collaborative manner. It sets out five (5) key principles designed to inform discussions and help organizations recognize the main issues, namely:

Respect for rights and freedoms in the workplace;
Protection of privacy and data governance;
Governance, participation and social dialogue;
Human oversight and transparency;
Sustainable development and well-being.

For each principle, the Guide provides examples of how AI is used in the workplace. It also highlights the associated benefits and challenges, and suggests practical steps to ensure that AI is adopted and used responsibly.

The Guide serves as a practical, evolving tool that organizations and labour market stakeholders are encouraged to tailor to their specific circumstances.

Accessible and regulated AI

While the adoption of AI in the workplace offers tangible opportunities for improvement, it also raises important issues that require careful oversight. With that in mind, the Guide aims to support the use

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of AI in a way that protects rights and users, while taking workplace considerations into account. It also aims to provide the various stakeholders involved with the tools they need to facilitate the adoption of AI at work.

A number of interesting challenges are likely to arise over the next few years, and Lavery's highly qualified professionals are ready to help you deal with them. Contact the team today.

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1. Comité consultatif du travail et de la main-d'œuvre, Avis du CCTM concernant les enjeux entourant l'implantation et l'usage des systèmes d'intelligence artificielle en milieux de travail au Québec, online: lien, April 9, 2026, p. 6. (In French only)
2. Act respecting the protection of personal information in the private sector, CQLR c. P-39.1; Act respecting Access to documents held by public bodies and the Protection of personal information, CQLR c. A-2.1.

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